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8 *Attorneys for Plaintiffs,*  
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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

14 JOANNA ARDALAN, ESQ, an  
15 individual; ONE LLP, a California  
16 Limited Liability Partnership,

17 Plaintiff,

18 v.

19 DOE 1, d.b.a LAW INTEGRAL, LLC,  
20 business entity unknown; DOE 2, d.b.a  
21 DEPUTY TRADEMARK, business  
22 entity unknown; DOE 3, p.k.a  
23 MICHELLE SPRAGUE, an individual;  
24 DOE 4, d.b.a TRADEMARK  
25 INTEGRAL, business entity unknown;  
26 DOE 5, d.b.a  
27 BRANDREGISTRATION.ORG,  
28 business entity unknown; and DOES 6  
through 10, inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-(DFMx)  
Hon. Kenly Kiya Kato

**DECLARATION OF JOANNA  
ARDALAN REGARDING PROOF  
OF SERVICE TO DEFENDANTS  
AND RESPONSE TO OSC**

**DECLARATION OF JOANNA ARDALAN**

I, Joanna Ardalan, declare as follows:

1. I am an attorney at law duly licensed to practice in this court and am a party to this case. I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify as follows:

2. Pursuant to the Court's October 19, 2023 order, on November 2, 2023, Plaintiffs Ardalan and One LLP served a copy of the complaint, summons, and a link to all of the case documents on file in this action until November 2, 2023. A true and correct copy of that email sent by Vanessa Soriano, One LLP's paralegal, is attached hereto as Exhibit A and a true and correct copy of the list of documents contained in the link is attached hereto as Exhibit B.

3. Ms. Soriano's email message to Deputy Trademark, Brand Registration, and Trademark Integral were returned. A true and correct copy of the return email is attached as Exhibit C.

4. The email sent to Law Integral was not returned; therefore, I believe they have received the email. No one has responded to this email message.

5. It appears defendants have registered a new website at deputytrademarks.com (one of the websites in the complaint is deputytrademark.com (as opposed to deputytrademarks, plural), which has ceased operations) and are operating a substantially similar unlawful business. To ensure they received notice of this complaint, on November 8, 2023, Ms. Soriano sent an email message to info@deputytrademarks.com providing notice of this lawsuit. A true and correct copy of that message is attached as Exhibit D. No one has responded to this email message.

6. Plaintiffs intend to file a request for default, but are preparing an *ex parte* application requesting that the Court permit them to issue limited third party discovery on the internet service providers (such as the websites' registrar, NameCheap, Inc.) who may have information about the identity and location of the

1 Defendants. Plaintiffs intend to file that *ex parte* request by no later than Monday,  
2 December 11, 2023. By doing so, Plaintiffs hope to exhaust all possible means to  
3 contact Defendants and if additional information is received regarding their location,  
4 Plaintiffs will attempt to serve Defendants once more.

5  
6 I declare under penalty of perjury that the foregoing is true and  
7 correct. Executed this 6<sup>th</sup> day of December 2023, in Beverly Hills,  
8 California.

9 /s/Joanna Ardalan  
Joanna Ardalan